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9 **UNITED STATES DISTRICT COURT**

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11 **DISTRICT OF NEVADA**

12 J.M. and I.M., minors by and through their natural  
parent and guardian, JESSICA HARGROVE,

13 Plaintiffs,  
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15 vs.  
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17 ANDREA HERNANDEZ; WALDO  
18 HERNANDEZ; ANITA MOODY; LISA  
BROCHU; KIM KALLAS; LISA RUIZ-LEE;  
PAULA HAMMACK; DOE Individuals I-X;  
ROE CLARK COUNTY DEPARTMENT OF  
19 FAMILY SERVICES EMPLOYEES XI-XX,  
individually and in their official capacities;  
COUNTY OF CLARK, a political subdivision of  
the State of Nevada; and ZOE CORPORATIONS  
20 XXI-XXX,

21 Defendants.  
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CASE NO.: 2:14-cv-01197-JAD-NJK

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24 **STIPULATION AND ORDER TO  
EXTEND DUE DATE FOR PLAINTIFF'S  
OPPOSITION TO DEFENDANT LISA  
BROCHU'S MOTION FOR SUMMARY  
JUDGMENT**

25 Pursuant to FRCP 6 and FRCP 26, the parties, by and through their respective counsel of  
26 record, hereby stipulate and agree to jointly move this Court for an Order to:  
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...

1       1. Extend the due date for Plaintiff's Opposition to Defendant Lisa Brochu's Motion for  
2       Summary Judgment from 09/18/15 to 09/25/15.  
3       2. Extend the due date for Defendant's Reply to Plaintiff's Opposition from 9/29/15 to  
4       10/6/15.

5       The Motion for summary judgment for Defendant Lisa Brochu was originally filed on  
6       August 25, 2015. This extension is requested as this Opposition involves a complicated legal  
7       matter, and the attorney previously assigned to this case, JASON LATHER, ESQ., no longer works  
8       for the law firm of GANZ & HAUF. Additionally, Mr. Lather's paralegal is no longer with the law  
9       firm of Ganz & Hauf. There has been a transition within his department, and it has taken Mr.  
10      Lather's replacement time to familiarize and catch up on his cases and assignments.

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1 Therefore, Plaintiff respectfully requests that this honorable Court grant the parties  
2 stipulation to extend the due date for Plaintiff's Opposition to Defendant Lisa Brochu's Motion for  
3 Summary Judgment to 9/25/2015.

4 DATED this \_\_\_\_ day of September, 2015.

5 GANZ & HAUF

7 /s/ Adam Ganz

8 ADAM GANZ, ESQ.  
9 Nevada Bar No. 06650  
10 8950 W. Tropicana Avenue, Suite 1  
11 Las Vegas, Nevada 89147  
12 *Attorney for Plaintiffs*

DATED this \_\_\_\_ day of September, 2015.

KOLESAR & LEATHAM

/s/ Jonathan Blum

ALAN J. LEFEBVRE, ESQ.  
Nevada Bar No. 000848  
JONATHAN BLUM, ESQ.  
Nevada Bar No. 009515  
400 S. Rampart Boulevard, Suite 400  
Las Vegas, Nevada 89145  
13 *Attorney for Defendant, Lisa Brochu*

**ORDER**

14 This matter having been stipulated to by the parties, through their respective counsel, and  
15 the Court being otherwise duly advised;

16 IT IS HEREBY ORDERED that the Due Date for Plaintiff's Opposition to Defendant Lisa  
17 Brochu's Motion for Summary Judgment will be extended from September 18, 2015 to September  
18 25, 2015, and extend the due date for Defendant's Reply to Plaintiff's Opposition from September  
19 29, 2015 to October 6, 2015.

20 Dated: September 22, 2015.

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UNITED STATES DISTRICT JUDGE